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Appellant Microsoft Corporation
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Title: Printer Driver Identification For A Remote Printer

REPLY BRIEF RESPONSIVE TO EXAMINER'S ANSWER OF 3/22/07

To: Commissioner for Patents
PO Box 1450
Alexandria, Virginia 22313-1450

From: Paul W. Mitchell (Tel. 509-324-9256; Fax 509-323-8979)
Customer No. 22801

Pursuant to 37 C.F.R. §41.37, Appellant hereby submits a reply brief for application 09/454,221, filed December 9th, 1999, within two months of the Examiner's Answer of 3/22/07.

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(1) Real Party in Interest

The real party in interest is Microsoft Corporation, the assignee of all right, title and interest in and to the subject invention.

(2) Related Appeals and Interferences

Appellant is not aware of any other appeals, interferences, or judicial proceedings that will directly affect, be directly affected by, or otherwise have a bearing on the Board's decision to this pending appeal.

(3) Status of Claims

Claims 1-40 stand rejected and are pending in this Application. The rejections of Claims 1-40 are appealed. Claims 3-14, 16-24, and 27-28 are original and hence bear the designator "(original)". Claims 1, 2, 15, 25-26, and 29-40 are previously presented and hence bear the designator "(previously presented)".

Claims 1-40 are set forth in the Appendix of Appealed Claims on page 19.

(4) Status of Amendments

The Final Office Action was mailed December 14th, 2004 (herein the "Final Office Action").

The Office mailed an Advisory Action on March 25th, 2005, after which Appellant filed a Notice of Appeal dated April 14th, 2005.

No amendments were made to the claims subsequent to the final rejection.

(5) Summary of Claimed Subject Matter

A concise explanation of each of the independent claims is included in this Summary section, including specific reference characters. These specific reference characters are examples of particular elements of the drawings for certain claimed embodiments. It is to be appreciated and understood that the claims are not to be limited to solely the elements corresponding to these reference characters and that this section is provided to comply with the requirement of 37 CFR § 41.37(c)(1)(v).

Claim 1 recites a method in a server-client environment (“server-client system” 50). The method comprises: receiving at the server (32 in Fig. 1 or 52 in Fig. 2) a driver identifier (included as part of printer driver information obtained at step 422) for a printer (88) that is attached to the client (34 Fig. 1 or 54 Fig. 2); using the driver identifier to select a closest matching driver (70) of a plurality of drivers (“driver match” 424) to install at the server (52); and installing, at the server (52) and not at the client (54), the selected driver (70) in order to enable applications executing on the server (52) to print to the printer (88) using the installed driver (70).

Claim 15 recites a method implemented in a server (32 or 52) in a server-client environment (“server-client system” 50). The method comprises: automatically selecting at least one of a plurality of drivers (driver library 68, pg. 7 line 14) corresponding to a peripheral device (“printer” 88) attached to the client (54) (step 214, pg. 10 lines 16-20); and installing, at the server (52) and not at the client (54), the selected at least one driver (step 214, pg. 10 lines 20-23) wherein the server (52) can interface with the peripheral device (88) using the driver (70)

to cause the selected at least one driver (70) to perform an action at the peripheral device (88) using the driver (70).

Claim 26 recites one or more computer-readable media having stored thereon a computer program that, when executed by one or more processors (56) of a server (52) in a client-server system (50), causes the one or more processors (56) to: receive a printer driver identifier for a printer attached to a client (step 422 pg. 11, lines 4-15), use the printer driver identifier to select one of a plurality of printer drivers to install at the server and not at the client (step 424) according to the following, if a particular printer driver of the plurality of printer drivers has a corresponding printer driver identifier that is the same as the received printer driver identifier, then selecting that particular driver (step 432), if a particular printer driver of the plurality of printer drivers currently has a corresponding printer driver identifier that is different than the received printer driver identifier but that corresponds to the same printer driver as the received printer driver identifier, then selecting that particular printer driver (step 434), and if a particular printer driver of the plurality of printer drivers has a corresponding driver name that is the same as a driver name received as part of the printer driver identifier, then selecting that particular printer driver without regard for whether that particular printer driver has a corresponding driver version that is the same as a driver version received as part of the printer driver identifier (step 436); and, install the selected printer driver at the server in order to enable the selected printer to print (step 428).

Claim 29 recites an apparatus comprising: a driver library (68) including a plurality of printer drivers (pg. 7 lines 14-15); and a driver matching module (69)

to select at least one of the plurality of printer drivers to be installed on the apparatus to enable a printer (88) attached to a client (54) connected with the apparatus to print, wherein the driver (70) is installed on the apparatus and not the client (54).

Claim 33 recites a system comprising: a client (54) computer having a local printer (88) attached thereto; and a server (52) computer coupled to the client (54) computer via a network (38), wherein the server (52) computer includes, a driver library (68) including a plurality of printer drivers (pg. 7 lines 14-15), and a driver matching module (69) to select at least one of the plurality of printer drivers (pg. 7 lines 14-15) for installation on the server (52) computer and not the client (54) computer to allow applications executing on the server (52) computer to print to the local printer (88), the driver matching module (69) selecting one of the plurality of printer drivers (pg. 7 lines 14-15) for installation based on a printer driver identifier (pg. 9, lines 10-19) and according to the following, if a particular printer driver of the plurality of printer drivers has a corresponding printer driver identifier that is the same as the received printer driver identifier, then selecting that particular driver for installation in order to enable the local printer to print (step 432), if a particular printer driver of the plurality of printer drivers currently has a corresponding printer driver identifier that is different than the received printer driver identifier but that corresponds to the same printer driver as the received printer driver identifier, then selecting that particular printer driver for installation in order to enable the local printer to print (step 434), and if a particular printer driver of the plurality of printer drivers has a corresponding driver name that is the same as a driver name received as part of the printer driver

identifier (step 436), then selecting that particular printer driver without regard for whether that particular printer driver has a corresponding driver version that is the same as a driver version received as part of the printer driver identifier for installation on the server computer in order to enable the local printer to print (step 428).

Claim 35 recites a computer readable medium having computer executable instructions, which when executed by a processor (56), causes the processor (56) to: receive at a server (52) a driver identifier (pg. 11, lines 4-15) for a printer (88) that is attached to a client (54) connected with the server (52), wherein the server (52) can print information at the client (54); use the driver identifier (pg. 11, lines 4-15) to select a closest matching driver (70) of a plurality of drivers (pg. 7 lines 14-15) to install at the server (52), and not at the client (54); and install, at the server (54), the selected driver (70) in order to enable applications that are executing to print to the printer (88) using the installed driver (70).

(6) Grounds of Rejection to be Reviewed on Appeal

In the Final Office Action of 12/14/05 claims 1, 15, 26, 33, and 35 were rejected under 35 U.S.C. §112 1st paragraph and 35 U.S.C. §112 2nd paragraph. The §112 2nd paragraph rejection was subsequently withdrawn in the 3/25/05 Advisory Action. The Advisory Action maintained the §112 1st paragraph rejection.

In the Final Office Action of 12/14/05 claims 1, 2, 14-17, 26-28 and 33-35 were rejected under 35 U.S.C. § 102(c) as being anticipated. Claims 3-13, 18-25,

29-32 and 36-40 were rejected under 35 U.S.C. § 103(a) as being unpatentable. The §102 and §103 rejections were maintained in the Advisory Action of 3/25/05.

The Examiner's Answer of 3/22/07 changed the grounds of rejection on appeal. The Examiner's Answer changed the §112 rejection from an enablement rejection to a written description rejection. The Examiner's Answer withdrew the §102 rejection and rejected all pending claims based upon §103. Accordingly, it is the §112 written description requirement rejection and the §103 rejection that Appellant now appeals.

(7) Argument

§112 REJECTIONS

Claims 1-26 and 33-40 stand rejected under 35 U.S.C. §112 1st paragraph as allegedly containing subject matter which was not described in the specification.

Appellant respectfully submits that the Examiner fails to establish a *prima facie* case for the §112 written description rejection in the Examiner's Answer of 3/22/07. First, the Office has failed its initial burden of establishing a reasonable basis to question the written description provided by the claimed invention. Second, the written description rejection is erroneous in light of the originally filed specification. For the reader's convenience, the subject matter of Claim 1 is provided below as representative of a claim containing the rejected language. By reciting claim 1, Appellant is not implying that the rejected claims have the same

claim scope. Rather, claim 1 is provided for discussion purposes, as these claims are rejected under §112 as a group rather than individually.

Claim 1 recites a method in a server-client environment, the method comprising:

- receiving at the server a driver identifier for a printer that is attached to the client;
- using the driver identifier to select a closest matching driver of a plurality of drivers to install at the server; and
- installing, at the server and not at the client, the selected driver in order to enable applications executing on the server to print to the printer using the installed driver.

The Examiner contends that “the limitation of “installing...not at the client” is not described in the application as originally filed”. Applicant respectfully disagrees that the claim language at issue is not supported by the disclosure as originally filed.

The standard for a written description rejection is that “each claim limitation must be expressly, implicitly, or inherently supported in the originally filed disclosure.” MPEP §2163.05. Appellant further notes that an applicant shows possession of the claimed invention by describing the claimed invention with all of its limitations using such descriptive means as words, structures, figures, diagrams, and formulas that fully set forth the claimed invention (emphasis added). *Lockwood v. American Airlines, Inc.*, 107 F.3d 1565, 1572, 41 USPQ2d 1961, 1966 (Fed. Cir. 1997).

Appellant respectfully contends that the Office’s §112 written description rejection is erroneous in light of Appellant’s originally filed specification and

drawings (excerpts of each are provided below). The Specification beginning on page 6 describes a server/client system 50 having a server 52 and a client 54. (Specification, Pg. 6, lines 10-12). (The designator 32 is utilized for the server in relation to Fig. 1 and designator 52 is utilized in relation to Fig. 2. The client is handled in a similar manner). The specification further describes:

The server 32 is a computer. A client 34, 36 may be a computer having Plug and Play capability, a computer that is not Plug and Play compatible, or a terminal, which does not have the processing capability of a computer. (Pg. 5 lines 13-16).

The server 32 is configured to provide a logically independent machine for each client 34, 36 connected to the network 38. That is, the server 32 establishes a session for each client 34, 36, provides the desktop 40, 42 for each client 34, 36, and makes server resources available to the clients 34, 36. Such resources include, but are not limited to, allocations of processor time, memory, data storage, video processing, application programs, etc. A user of either of the clients 34, 36 interacts with the desktop 40, 42 on the client 34, 36 to run software applications that reside on the server 32. While the user provides input to and receives output from the client 34, 36, most processing is performed at the server 32. (Page 5 line 22 – Page 6 line 5).

The server 52 is shown having a printer driver 70 and a printer queue 72 installed and resident within the memory 58. (Pg. 7 lines 5-6). The printer driver 70 is a printer-specific software program that provides an interface between a printer and the server 52 and allows the server 52 to provide print functions via the printer. (Pg. 7 lines 8-11).

Applicant further provides below a copy of Fig. 2 as originally filed. Applicant notes that Fig. 2 illustrates a server/client system 50 where a print driver 70 is installed at the server 52 and not at the client 54. One of skill in the art can reasonably recreate the claimed invention as defined in the subject claims from Fig. 2 (provided below) and the supporting description as originally filed.

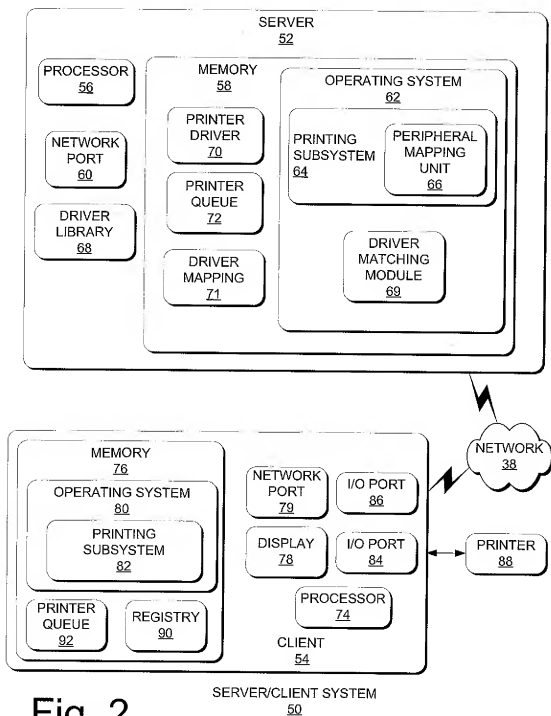


Fig. 2

The above cited description from the specification and Fig. 2 both consistently

describe a scenario where a printer driver 70 is installed at the server (32 and 52) and not at the client (34 and 54). Was this purposeful or was it mere oversight that was leveraged by the Applicant to avoid obvious elements of a reference as suggested by the Examiner? The definition of a print driver as contained in the above text sheds light on this issue. "The printer driver 70 is a printer-specific software program that provides an interface between a printer and the server 52 and allows the server 52 to provide print functions via the printer." Given this definition, a print driver on the client would have no function. As such, the definition of a print driver is consistent with the print driver being installed on the server and not on the client as it provides an interface between a printer and the server. Accordingly, the original specification provides implicit support to such a configuration where a print driver is installed on the server and not on the client thereby satisfying MPEP §2163.05.

Consider further an example of an implementation described in the specification, and upon which claim 1 reads. Such an example is commonly referred to as a "terminal session scenario" or similar moniker. Consistent with this example, a server 32 is a computer. (Pg. 5 lines 13-16). A client 34 may be a computer having Plug and Play capability, a computer that is not Plug and Play compatible, or a terminal, which does not have the processing capability of a computer. (Pg. 5 lines 13-16). The server 32 is configured to provide a logically independent machine for the client 34. That is, the server 32 establishes a session (e.g. terminal session) for the client 34, provides the desktop 40 for the client 34, and makes server resources available to the client 34. Such resources include, but

are not limited to, allocations of processor time, memory, data storage, video processing, application programs, etc.

A user of the client 34 interacts with the desktop 40 on the client 34 to run software applications that reside on the server 32. While the user provides input to, and receives output from, the client 34, most processing is performed at the server 32. (Page 5 line 22 – Page 6 line 5). The server 52 is shown having a printer driver 70 and a printer queue 72 installed and resident within the memory 58. (Pg. 7 lines 5-6). The printer driver 70 is a printer-specific software program that provides an interface between a printer and the server 52 and allows the server 52 to provide print functions via the printer.

Claim 1 reads on such a terminal session scenario, where the print driver is installed at the server and not at the client. Such a configuration allows the user to print on a printer attached to the client even though the actual processing is occurring at the server rather than at the client. In such an example, a device can function as a client without having processing and memory resources for communicating with a printer which is physically coupled to it.

Appellant respectfully submits that the disclosure as originally filed supports the rejected claims and provides examples of implementations upon which the rejected claims read without any need to look for external definitions. Accordingly, Appellant respectfully requests that the §112 rejection be overturned.

Appellant further takes this opportunity to express on the record that the present §112 issue requires analysis of the pending claims in light of the specification and drawings. The Office has continued to discuss extrinsic evidence in its analysis (see response to argument, pages 10-11 of the Examiner's

Answer of 3/22-07). Appellant notes that the Examiner's examination of extrinsic evidence adds nothing to the present analysis. Appellant further notes that Appellant does not agree with and/or otherwise acquiesce to any external definitions or inclusion of extraneous evidence introduced by the Examiner in these proceedings. Instead, Appellant encourages review of the present specification and drawings to define claim language where necessary.

§103 REJECTIONS

The Examiner's Answer of 3/22/07 suggests that a combination of Poger and Kathail teaches all of the features of claims 1-40. Applicant submits that the art of record does not render obvious the claimed subject matter.

Claims 1, 14-17, 26-28, and 33-35

Appellant respectfully submits that the Examiner fails to establish a *prima facie* case of obviousness for rejecting claims 1, 14-17, 26-28, and 33-35 in the Examiner's Answer for at least two reasons. First, the Office fails to establish a *prima facie* case of obviousness since the suggested combination fails to teach all of the claim elements of Claims 1, 14-17, 26-28, and 33-35. Second, the Office offers insufficient motivation for the proposed combination. Appellant has reproduced claim 1 below for discussion purposes. The other claims may have additional and/or different patentable features from those of claim 1.

Claim 1 recites a method in a server-client environment, the method comprising:

- receiving at the server a driver identifier for a printer that is attached to the client;

- using the driver identifier to select a closest matching driver of a plurality of drivers to install at the server; and
- installing, at the server and not at the client, the selected driver in order to enable applications executing on the server to print to the printer using the installed driver.

Appellant notes that claim 1 is directed to a method encompassing processes that involve three separate and distinct elements: a server, a client, and a printer. Appellant submits that Poger describes a server with a network device(s) connected to the server. (See Poger Fig. 1.) In making out the rejection on page 6, Number 6 of the 3/22/07 Examiner's Answer, the office uses the terms "network device/client" interchangeably. Applicant submits that there is no support in Poger for this interpretation. In fact, Poger defines device from a hardware perspective as "a variety of system resources, including hardware devices, e.g., a magnetic disk drive device, and display devices." (Poger, col. 1, lines 15-17.) It is noteworthy that the term "client" does not even appear in Poger. Considering arguendo that a printer is included in Poger's definition of a "device", Poger remains totally silent in relation to clients of any sort, much less to a printer that is attached to [a] client as recited in claim 1. Accordingly, without any contemplation whatsoever of a server, a client and a printer, Poger does not describe or teach "installing, at the server and not at the client, the selected driver in order to enable applications executing on the server to print to the printer using the installed driver" as recited in claim 1. Kathail adds nothing in this regard. The Office contends that Kathail describes "automatically determining a driver and corresponding family for a particular device" and where that particular device is a "printing device". Even when considered in a light most favorable to the Office

the proposed combination of Poger and Kathail fails to describe, teach, or suggest all of the recited elements of claim 1.

Further, the Office alleges that the motivation to incorporate matching print drivers insures that distributed processing in an open platform is supported, especially in thin-clients. Examination of Poger and Kathail finds the references silent as to the terms “distributed processing”, “open platform”, and “thin-clients”. The Office does not offer any nexus between the references and these terms, which the Office relies upon as supplying the requisite motivation. Accordingly, the record is devoid of any evidence of how the skilled artisan, in possession of the art of record, would be motivated to combine the references. For at least this additional reason, the Office has failed to establish a prima facie §103 rejection. Accordingly, at least for the above mentioned reasons, the Office has failed to establish a prima facie case of obviousness and Appellant respectfully requests that the §103 rejection of claims 1, 14-17, 26-28, and 33-35 be overturned.

Claims 2-6, 8-13, 18-24, 29-32 and 36-40 depend from allowable base claims and, as such, are allowable for the reasons described above. These claims recite additional features which are not taught or suggested by the art of record. Appellant respectfully requests that the §103 rejection of claims 2-6, 8-13, 18-24, 29-32 and 36-40 be overturned for at least this reason.

Claim 25 does not appear to be addressed from a §103 perspective in the Examiner's Answer of 3/22/07. This claim is allowable at least for the reasons described above.

Conclusion

Appellant respectfully submits that all of the Examiner's rejections have been traversed. As such, Appellant respectfully submits that all of the claims are in condition for allowance.

Respectfully Submitted,

Dated: 5/22/07

By: Paul W. Mitchell

Paul W. Mitchell
Lee & Hayes, PLLC
Reg. No. 44,453
(509) 324-9256 ext. 237

(8) Appendix of Appealed Claims

1. (Previously Presented) A method in a server-client environment, the method comprising:

receiving at the server a driver identifier for a printer that is attached to the client;

using the driver identifier to select a closest matching driver of a plurality of drivers to install at the server; and

installing, at the server and not at the client, the selected driver in order to enable applications executing on the server to print to the printer using the installed driver.

2. (Previously Presented) A method as recited in claim 1, wherein the receiving comprises receiving the driver identifier from the client.

3. (Original) A method as recited in claim 1, wherein the driver identifier includes both a driver name and a driver version.

4. (Original) A method as recited in claim 1, wherein the using comprises accessing a library at the server that stores the plurality of drivers.

5. (Original) A method as recited in claim 1, wherein:

the using comprises checking whether any of the plurality of drivers has a corresponding driver identifier that is the same as the received driver identifier; and

if a particular driver of the plurality of drivers has a corresponding driver identifier that is the same as the received driver identifier, then selecting that driver to install at the server.

6. (Original) A method as recited in claim 1, wherein:

the using comprises checking whether any of the plurality of drivers currently has a corresponding driver identifier that is different than the received driver identifier but that corresponds to the same driver as the received driver identifier; and

if a particular driver of the plurality of drivers currently has a corresponding driver identifier that is different than the received driver identifier but that corresponds to the same driver as the received driver identifier, then selecting that driver to install at the server.

7. (Original) A method as recited in claim 6, wherein one of the plurality of drivers currently has a corresponding driver identifier that is different than the received driver identifier but that corresponds to the same driver because of a driver name change by a source of the driver.

8. (Original) A method as recited in claim 6, further comprising:
issuing a notification that the selected driver currently has a corresponding driver identifier that is different than the received driver identifier but that corresponds to the same driver as the received driver identifier.

9. (Original) A method as recited in claim 1, wherein:
the receiving comprises receiving a driver name and a driver version;
the using comprises checking whether any of the plurality of drivers has a corresponding driver name that is the same as the received driver name; and
if a particular driver of the plurality of drivers has a corresponding driver name that is the same as the received driver name, then selecting that driver to install at the server.

10. (Original) A method as recited in claim 9, further comprising:
selecting a first driver with a corresponding driver name that is the same as the received driver name to install at the server without regard for whether the

received driver version is the same as a corresponding driver version of the first driver.

11. (Original) A method as recited in claim 9, further comprising:
issuing a notification that the selected driver has a corresponding driver name that is the same as the received driver name but a corresponding driver version that is different than the received driver version.

12. (Original) A method as recited in claim 9, further comprising:
checking whether the selected driver has a corresponding driver version that is the same as the received driver version; and

if the selected driver does not have a corresponding driver version that is the same as the received driver version, then obtaining a new copy of the driver that has the same driver version as the received driver version.

13. (Original) A method as recited in claim 12, further comprising
obtaining a new copy of the driver only if the received driver version indicates a more recent version of the driver than is indicated by the driver version corresponding to the selected driver.

14. (Original) At least one computer-readable memory containing a computer program that is executable by a processor to perform the method recited in claim 1.

15. (Previously Presented) A method implemented in a server in a server-client environment, the method comprising:

automatically selecting at least one of a plurality of drivers corresponding to a peripheral device attached to the client; and

installing, at the server and not at the client, the selected at least one driver wherein the server can interface with the peripheral device using the driver to cause the selected at least one driver to perform an action at the peripheral device using the driver.

16. (Original) A method as recited in claim 15, wherein the peripheral device comprises a printer.

17. (Original) A method as recited in claim 15, wherein the automatically selecting comprises using a received driver identifier corresponding to a printer to select a closest matching driver of the plurality of drivers to install at the server.

18. (Original) A method as recited in claim 15, wherein:

the automatically selecting comprises checking whether any of the plurality of drivers has a corresponding driver identifier that is the same as a received driver identifier; and

if a particular driver of the plurality of drivers has a corresponding driver identifier that is the same as the received driver identifier, then installing that driver at the server.

19. (Original) A method as recited in claim 15, wherein:

the automatically selecting comprises checking whether any of the plurality of drivers currently has a corresponding driver identifier that is different than a received driver identifier but that corresponds to the same driver as the received driver identifier; and

if a particular driver of the plurality of drivers currently has a corresponding driver identifier that is different than the received driver identifier but that corresponds to the same driver as the received driver identifier, then installing that driver at the server.

20. (Original) A method as recited in claim 19, further comprising:

issuing a notification that the installed driver currently has a corresponding driver identifier that is different than the received driver identifier but that corresponds to the same driver as the received driver identifier.

21. (Original) A method as recited in claim 15, wherein:

the automatically selecting comprises checking whether any of the plurality of drivers has a corresponding driver name that is the same as a received driver name; and

if a particular driver of the plurality of drivers has a corresponding driver name that is the same as the received driver name, then installing that driver at the server.

22. (Original) A method as recited in claim 21, further comprising:

selecting a first driver with a corresponding driver name that is the same as the received driver name to install at the server without regard for whether a received driver version is the same as a corresponding driver version of the first driver.

23. (Original) A method as recited in claim 21, further comprising:

issuing a notification that the installed driver has a corresponding driver name that is the same as the received driver name but a corresponding driver version that is different than the received driver version.

24. (Original) A method as recited in claim 21, further comprising:

checking whether the installed driver has a corresponding driver version that is the same as a received driver version; and

if the selected driver does not have a corresponding driver version that is the same as the received driver version, then obtaining a new copy of the driver that has the same driver version as the received driver version.

25. (Previously Presented) The method of claim 15, wherein at least one computer-readable memory contains a computer program that is executable by a processor to perform the method.

26. (Previously Presented) One or more computer-readable media having stored thereon a computer program that, when executed by one or more processors of a server in a client-server system, causes the one or more processors to:

receive a printer driver identifier for a printer attached to a client;

use the printer driver identifier to select one of a plurality of printer drivers to install at the server and not at the client according to the following,

if a particular printer driver of the plurality of printer drivers has a corresponding printer driver identifier that is the same as the received printer driver identifier, then selecting that particular driver,

if a particular printer driver of the plurality of printer drivers currently has a corresponding printer driver identifier that is different than the received printer driver identifier but that corresponds to the same printer driver as the received printer driver identifier, then selecting that particular printer driver, and

if a particular printer driver of the plurality of printer drivers has a corresponding driver name that is the same as a driver name received as part of the printer driver identifier, then selecting that particular printer driver without regard for whether that particular printer driver has a corresponding driver version that is the same as a driver version received as part of the printer driver identifier; and

install the selected printer driver at the server in order to enable the selected printer to print.

27. (Original) A method as recited in claim 26, wherein the server comprises a terminal server and wherein the client comprises a terminal server client.

28. (Original) A method as recited in claim 26, wherein one of the plurality of printer drivers currently has a corresponding printer driver identifier that is different than the received printer driver identifier but that corresponds to the same printer driver due to a name of the printer driver being changed.

29. (Previously Presented) An apparatus comprising:
a driver library including a plurality of printer drivers; and
a driver matching module to select at least one of the plurality of printer drivers to be installed on the apparatus to enable a printer attached to a client connected with the apparatus to print, wherein the driver is installed on the apparatus and not the client.

30. (Previously Presented) An apparatus as recited in claim 29, wherein the driver matching module further:

checks whether any of the plurality of drivers has a corresponding driver identifier that is the same as a received driver identifier; and

wherein if a particular driver of the plurality of drivers has a corresponding driver identifier that is the same as the received driver identifier, then install that driver at the server.

31. (Previously Presented) An apparatus as recited in claim 29, further comprising:

a mapping table to map previous driver identifiers to subsequent driver identifiers;

wherein the driver matching module further checks the mapping table to determine whether any of the plurality of drivers currently has a corresponding driver identifier that is different than a received driver identifier but that corresponds to a same printer driver as the received printer driver identifier; and

if so, then installs the corresponding printer driver at the server.

32. (Previously Presented) An apparatus as recited in claim 29, wherein the driver matching module further:

checks whether any of the plurality of printer drivers has a corresponding driver name that is the same as a received driver name; and

wherein if a particular printer driver of the plurality of printer drivers has a corresponding driver name that is the same as the received driver name, then install that printer driver at the server without regard for whether that particular printer driver has a corresponding driver version that is the same as a received driver version.

33. (Previously Presented) A system comprising:

a client computer having a local printer attached thereto; and

a server computer coupled to the client computer via a network, wherein the server computer includes,

a driver library including a plurality of printer drivers, and
a driver matching module to select at least one of the plurality of printer drivers for installation on the server computer and not the client computer to allow applications executing on the server computer to print to the local printer, the driver matching module selecting one of the plurality of printer drivers for installation based on a printer driver identifier and according to the following,

if a particular printer driver of the plurality of printer drivers has a corresponding printer driver identifier that is the same as the received printer driver identifier, then selecting that particular driver for installation in order to enable the local printer to print,

if a particular printer driver of the plurality of printer drivers currently has a corresponding printer driver identifier that is different than the received printer driver identifier but that corresponds to the same printer driver as the received printer driver identifier, then selecting that particular printer driver for installation in order to enable the local printer to print, and

if a particular printer driver of the plurality of printer drivers has a corresponding driver name that is the same as a driver name received as part of the printer driver identifier, then selecting that particular

printer driver without regard for whether that particular printer driver has a corresponding driver version that is the same as a driver version received as part of the printer driver identifier for installation on the server computer in order to enable the local printer to print.

34. (Previously Presented) A system as recited in claim 33, wherein the client computer transmits the printer driver identifier to the server computer.

35. (Previously Presented) A computer readable medium having computer executable instructions, which when executed by a processor, causes the processor to:

receive at a server a driver identifier for a printer that is attached to a client connected with the server, wherein the server can print information at the client;

use the driver identifier to select a closest matching driver of a plurality of drivers to install at the server, and not at the client; and

install, at the server, the selected driver in order to enable applications that are executing to print to the printer using the installed driver.

36. (Previously Presented) The computer-readable media of claim 35, wherein said applications run on the server.

37. (Previously Presented) The computer-readable media of claim 35, wherein the driver identifier includes both a driver name and a driver version.

38. (Previously Presented) The computer-readable media of claim 35, wherein the driver identifier is used to access a library at the server that stores the plurality of drivers.

39. (Previously Presented) The computer-readable media of claim 35, wherein:

the driver identifier is used to check whether any of the plurality of drivers has a corresponding driver identifier that is the same as the received driver identifier; and

if a particular driver of the plurality of drivers has a corresponding driver identifier that is the same as the received driver identifier, then select that driver to install at the server.

40. (Previously Presented) The computer-readable media of claim 35, wherein:

the driver identifier is used to check whether any of the plurality of drivers currently has a corresponding driver identifier that is different than the received driver identifier but that corresponds to the same driver as the received driver identifier; and

if a particular driver of the plurality of drivers currently has a corresponding driver identifier that is different than the received driver identifier but that corresponds to the same driver as the received driver identifier, then select that driver to install at the server.

(9) **Appendix of Evidence**

None.

(10) **Appendix of Related Proceedings**

None.